

**U.S. DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

SWEIGERT	CIVIL CASE #:
V.	1:18-CV-08653-VEC
GOODMAN	JUDGE VALERIE E. CAPRONI

PLAINTIFF'S SECOND RESPONSE TO ORDER ECF No. 218

Plaintiff now responds to the commandment “*Plaintiff shall respond under oath to the following interrogatories: a. Identify every statement made by Defendant that Plaintiff claims was defamatory toward Plaintiff and, for each such statement, provide a citation to a specific source.*” (See ECF No. 208 for language). **This is the SECOND response to ECF no. 218.**

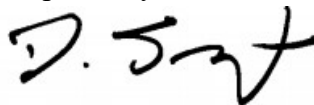
Plaintiff reserves the right to submit follow-up pleadings on this matter until the deadline of April 30, 2021.

That response is contained herein and are certified under the penalties of perjury as truthful. All representations included herein are fair and accurate reproductions of the original sources.

A Certificate of Service appears on the LAST page of this pleading.

Signed this nineteenth (19th) day of March, 2021.

Respectfully,



D. Geo. Sweigert

**D. GEORGE SWEIGERT
GENERAL DELIVERY
NEVADA CITY, CA 95959
SPOILIATION-NOTICE@MAILBOX.ORG**

*Statement no. 8
(Defendant to Hawkins and audience)*

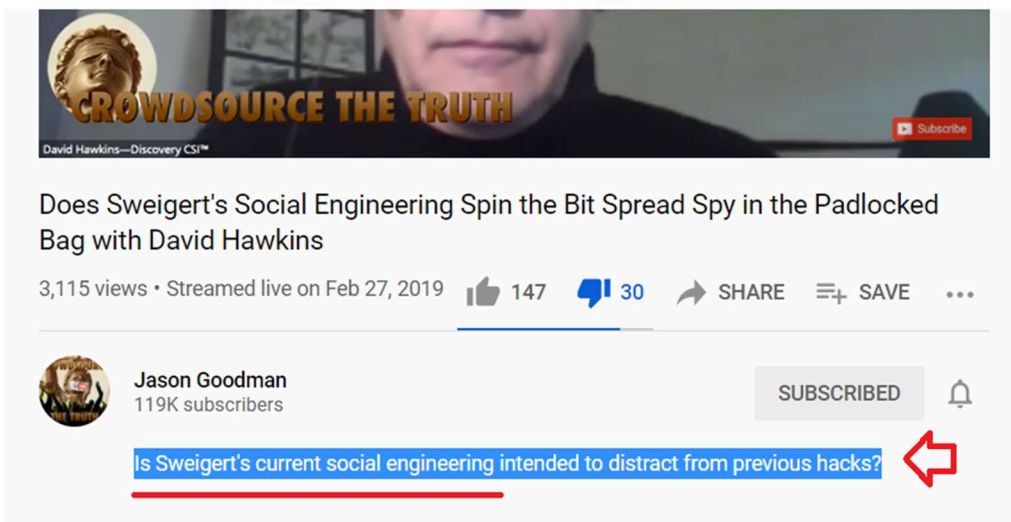
Statements made by Defendant:

33:27 It seems to me, what **Mr. Sweigert** and his ill-advised associates on the Internet are attempting to do is to put together a fund to bring fraudulent lawsuits against you (Hawkins) and I, and I would caution anyone who is considering getting involved with **David Sweigert – that I see evidence that he has committed felonies.** And therefore, conspiring with him could expose you to serious legal issues if law enforcement chooses to **act on the evidence that I am actively providing of these felonies.** Things like mail fraud, fraud on the court, things that he has done, **this organized harassment campaign.**

39:39 And if **Mr. Sweigert** doesn't approve of that, well he is certainly welcome to present factual evidence, but what he is doing is making up nonsense. And **conspiring with others around the Internet to break the law,** to engage in civil torts, and just generally be a troublemaker.

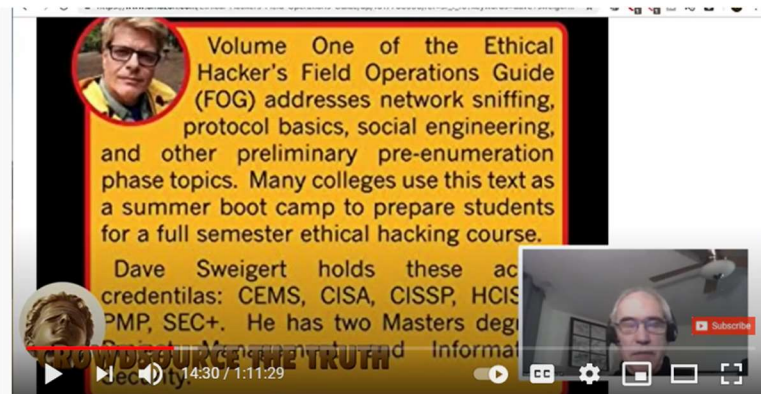
Statements made by David Hawkins:

9:39 Pedophile, pimping and trafficking network. What did Gareth Williams know, and when did he know it? And did he get into that network through a backdoor **carelessly, willfully, maliciously, or criminally left by Dave Sweigert. So Sweigert has got a lot to answer for.**



Is Sweigert's current social engineering intended to distract from previous hacks?

https://www.youtube.com/watch?v=yx_6sj33FDs



Does Sweigert's Social Engineering Spin the Bit Spread Spy in the Padlocked Bag with David Hawkins



Does Sweigert's Social Engineering Spin the Bit Spread Spy in the Padlocked Bag with David Hawkins

www.youtube.com › watch

Does Sweigert's Social Engineering Spin the Bit Spread ... - YouTube

Is Sweigert's current social engineering intended to distract from previous hacks? ... **Spin the Bit Spread Spy in the Padlocked Bag with David Hawkins.**

odysee.com › does-sweigert-s-social-engineering-spin:0

Does Sweigert's Social Engineering Spin the Bit Spread Spy in the ...

Does Sweigert's Social Engineering **Spin the Bit Spread Spy** in the Padlocked Bag with David Hawkins. February 26th, 20190 views. Let @Crowdsourcethetruth ...

www.reddit.com › TruthLeaks › comments › avme39

Does Sweigert's Social Engineering Spin the Bit Spread Spy in the ...

Does Sweigert's Social Engineering **Spin the Bit Spread Spy** in the Padlocked Bag with David Hawkins. Close. 2. Posted by. u/chickyroque. 1000% rogue.

www.patreon.com › posts › does-sweigerts-24995443

'Does Sweigert's Social Engineering Spin the Bit Spread Spy in the ...

'Does Sweigert's Social Engineering **Spin the Bit Spread Spy** in the Padlocked Bag?' with David Hawkins. 11 Likes. Jeannie Garcia. I enjoy your sense of humor ...

See paragraph 36 of the Second Amended Complaint (ECF no. 88)

*Statement no. 9
(Defendant to audience)*

Statements made by the Defendant:

- 9:37 I want to encourage people who are involved in conspiracies or criminal activity, if you are doing something and you know it is the wrong thing to do you should come forward. **And Manuel Chavez should be praised for that.** Because he is coming under fire. **David Sweigert has been directing his attention towards Manuel Chavez.** Very anti-Tzu Su of me to attract Mr. Sweigert's attention while he is so busily getting in his own way. **He has now taken to basically threatening the federal judge in the Southern District of New York, that's Valerie Caproni.**
- 13:48 If **Manuel Chavez** gives me an e-mail or series of e-mails that provide evidence that there was a conspiracy between Robert David Steele, Tanya Cornwell, Stephen Biss, Thomas Schoenberger ... long pause .. and others (implying Plaintiff).



<https://www.youtube.com/watch?v=sB052S1d0AI>

www.youtube.com › watch

Steele v Goodman Advances to the Next Round - YouTube

Steele v Goodman Advances to the Next Round. Jason Goodman · 1:48:35 · The Intelligence Assessment with Kevin Shipp – HAMR Round Table with Mike ...

www.bitchute.com › video

Steele v Goodman Advances to the Next Round - BitChute

Steele v Goodman Advances to the Next Round. Watch. PausePlay. % buffered 00:00. 00:00. UnmuteMute. Disable captionsEnable captions. Settings.



Steele v Goodman Advances to the Next Round

5.6K views · Streamed 1 year ago

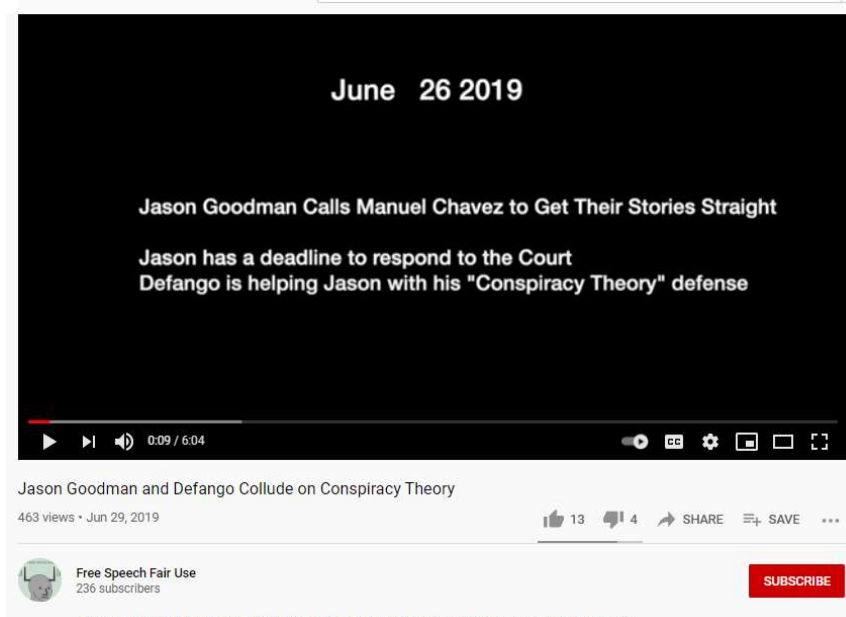
Jason Goodman

Trial date is set as Robert David Steele and his legal team continue to game the U.S. Civil Justice System to silence and oppress ...

*Statement no. 10
(Defendant to Manuel
Chavez, III and to audience)*

Statements made by the Defendant:

- 2:49** That's my position. That he (BISS) had someone paying you (CHAVEZ) to do that stuff. He was working with Robert David Steele, you were working with Robert David Steele at the time, **Sweigert was working with you, Tyron Simpson was working with you and Sweigert. And these are the elements of the conspiracy.**
- 4:20** You sent me that e-mail, that Schoenberger had sent you. **Schoenberger is sending information to Sweigert . . . Schoenberger is sending information to Steele. . . . He is a point of contact.**
- 5:17** Thomas Schoenberger tells Robert David Steele, "go tell everyone that Goodman works for Mossad" and **Thomas Schoenberger tells Sweigert to tell you (CHAVEZ) to tell everybody that "Goodman works for Mossad" while they are in a conspiracy.**



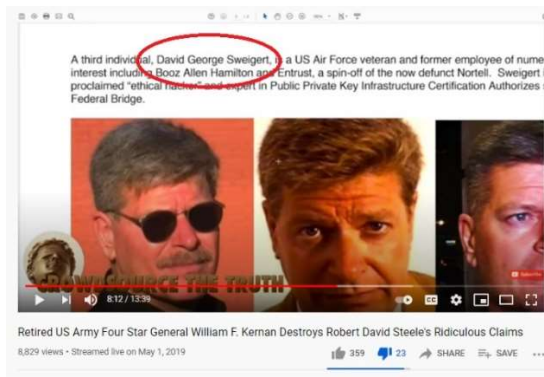
<https://www.youtube.com/watch?v=It5SFuVxhMM&t=203s>



*Statement no. 11
(Defendant to General and audience)*

Statements made by the Defendant:

- 8:06** And the third individual, David George Sweigert, retired U.S. Air Force and contract employee of various agencies. Have you ever seen this guy before?
- 8:57** I am just trying to determine why these individuals (Robert David Steele, Susan Holmes and Plaintiff) would have selected this book (NATO Open Source Manual). They are so persistent in their efforts to stop me from reporting on things. Their explanation of simply not liking my news program cannot possibly be the real explanation for their multiple lawsuits they have brought against me, and constant harassment and defamation.
- 11:46** Do you have any contacts that could raise an alert to Mr. Nunez (Congressman) as to the activities of these individuals.



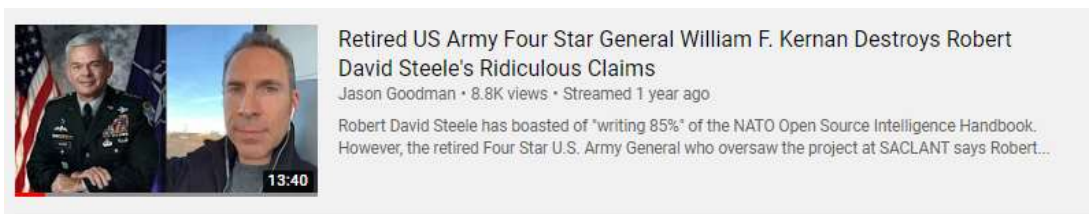
<https://www.youtube.com/watch?v=e2VXOih9h4A>



www.youtube.com › watch
Retired US Army Four Star General William F. Kernan ...
May 1, 2019 — However, the retired Four Star U.S. Army General who oversaw... William F. Kernan Destroys Robert David Steele's Ridiculous Claims.

thehub.press › National
Retired US Army Four Star General William F. ... - The Hub Press
Retired US Army Four Star General William F. Kernan Destroys Robert David Steele's Ridiculous Claims. by Thehub Press - May 19, 2020. in National.

odysee.com › @Crowdsourcethetruth › retired-us-ar...
Retired US Army Four Star General William F. Kernan Destroys ...
Robert David Steele has boasted of "writing 85%" of the NATO Open Source Intelligence Handbook. However, the retired Four Star U.S. Army General who ...



Statement no. 12
(*Headline and description*)

Video podcast description:

Susan Lutzke aka Susan Holmes aka Queen Tut is a horrible but frequent liar. She recently called me, revealing a long suspected conspiracy between her, D. George "Acton" Sweigert and Robert David Steele. While nothing she says can be believed at this point, how else would **David Sweigert** know the true identity of Oakey Marshall Richards were this particular admission not true? The sinister plans of these **malicious social engineers** are being revealed before our eyes as the fraudulent and vexatious lawsuit brought by Steele continues to crumble.



<https://www.youtube.com/watch?v=WwyRPFhW-HE&feature=youtu.be>



www.youtube.com › watch

Susan "Queen Tut" Lutzke/Holmes Reveals David Sweigert ...

Apr 30, 2019 — Susan Lutzke aka Susan Holmes aka Queen Tut is a horrible but frequent liar. She recently called me, revealing a long suspected conspiracy ...



Susan "Queen Tut" Lutzke/Holmes Reveals David Sweigert – Robert David Steele Lawsuit Conspiracy

Jason Goodman • 8.5K views • Streamed 1 year ago

Susan Lutzke aka Susan Holmes aka Queen Tut is a horrible but frequent liar. She recently called me, revealing a long suspected conspiracy between her, D. George "Acton" Sweigert and Robert...

CC

See page 26 of the Second Amended Complaint (ECF no. 88)

*Statement no. 13
(Headline and description)*

Statements by the Defendant:

- 15:33 It's just like an idiot, like **Manuel Chavez** doing the same thing. Each of these people is complicit in what is now an organized operation. Where they are working together to defame me, to slander me, and to harass me.
- 21:48 **Shrouded in an organized campaign of harassment.** Interstate harassment over the Internet, over the telephone. **These are crimes people.** So if you are engaged in doing that right now, Dean Fougere, **Manuel Chavez, Robert David Steele, David Sweigert, Queen Tut Lutzke Holmes**, whatever.



<https://www.youtube.com/watch?v=1koAEHYbZTA&t=407s>



www.youtube.com › watch

Libel, Lies and Lawsuits – Queen Tut Evidence Exposed ...

Mar 17, 2018 — Queen Tut remains an "anonymous" covert operative. She hides behind code names and clandestine locations hurling accusations with no ...



Libel, Lies and Lawsuits – Queen Tut Evidence Exposed

10K views • Streamed 2 years ago

Jason Goodman

Queen Tut remains an "anonymous" covert operative. She hides behind code names and clandestine locations hurling ...

See page 27 of the Second Amended Complaint (ECF no. 88)

*Statement no. 14
(Defendant to audience)*

Statements made by the Defendant:

- 2:19** Robert David Steele and his crew were going to bring a series of lawsuits against me. **They wanted multiple federal lawsuits in multiple states.** Because he wants to overrun me.
- 7:30** Paid employees of the court to process **David Sweigert's nonsense, Robert David Steele's nonsense.**
- 8:11** It is interesting to observe how upset **David Sweigert is, now that Manuel Chavez and I have communicated.** Manuel Chavez, I never thought we could communicate calmly, peaceable (noise) but we have. He has shared information with me. **He shared some e-mails with me that people are going to find very stunning.**



<https://www.youtube.com/watch?v=eZVXOih9h4A>



www.pscp.tv › ...
CrowdsourcetheTruth: "Robert David Steele's #FakeLawsuit Gets Its ...
... reload the page. Get the App. Ended last year. Robert David Steele's #FakeLawsuit Gets Its Day in Court. CrowdsourcetheTruth. @csthtruth - Open in App.

www.youtube.com › watch
Robert David Steele's #FakeLawsuit Gets Its Day in Court - YouTube
Robert David Steele's #FakeLawsuit Gets Its Day in Court. Jason Goodman · 8:42 · Zero Hour for Robert David Steele's #FakeLawsuit in Virginia Federal Court.

www.patreon.com › posts › robert-david-its-28793891
Robert David Steele's #FakeLawsuit Gets Its Day in Court Take 2 for ...
...
Robert David Steele's #FakeLawsuit Gets Its Day in Court Take 2 for Sound. An unexpected and unexplained glitch caused the audio from last night's walk 'n ...

odyssey.com › robert-david-steele-s-fakelawsuit-gets-f
Robert David Steele's #FakeLawsuit Gets Its Day in Court - Odyssey
Robert David Steele's #FakeLawsuit Gets Its Day in Court. July 29th, 20193 views. Let @CrowdsourcetheTruth know you enjoyed this! 0 0 Support Repost Share.



Robert David Steele's #FakeLawSuit is About to Get Real...
6.4K views · Streamed 1 year ago
Jason Goodman
... next steps in Robert David Steele's fraudulent lawsuit against me and Crowdsorce the Truth. Now is your chance to stand up to ...

*Statement no. 15
(Defendant to audience)*

Statements made by Defendant:

- 0:45** Social engineering is a huge, huge problem.
- 1:06** There was a bit of unintended consequence to the exposure of social engineering.
- 2:36** What's that book (see screen shot below)? That's a book written by **Dave Sweigert**. An ethical hacker's guide to doing whatever. One of the topics he covers is social engineering.
- 3:03** David Sweigert wrote THE book on social engineering. Social engineering is about lying to you, it's about tricking you.
- 10:03** Think of the danger in this type of social engineering.



<https://www.youtube.com/watch?v=9lwrmkm0w8Q> 

www.youtube.com › watch

Why You Should Live Every Week Like It's Social Engineering Week

...

Why You Should Live Every Week Like It's Social Engineering Week. 8,566 views8.5K views. • Streamed live on Oct 26, 2019. 520. 73. Share. Save. 520 / 73 ...

www.lastdaysnewsnetwork.com › 2019/10 › why-you-s...

Why You Should Live Every Week ... - LAST DAYS NEWS NETWORK

Why You Should Live Every Week Like It's Social Engineering Week. Posted by LAST DAYS NEWS NETWORK at 10/27/2019 03:45:00 AM. Reactions: ...

kimelayu.blogspot.com › 2019/11 › why-you-should-li...

Why You Should Live Every Week Like It's Social Engineering Week

Why You Should Live Every Week Like It's Social Engineering Week · Bannon; Coronavirus pandemic is going to be the most significant thing of modern political ...

www.bitchute.com › video

Why You Should Live Every Week Like It's Social ... - BitChute

Why You Should Live Every Week Like It's Social Engineering Week. Watch. PausePlay. % buffered 00:00. 00:00. UnmuteMute. Disable captionsEnable ...

www.reddit.com › KalitorMensa › comments › dnnvmr

Why You Should Live Every Week Like It's Social ... - Reddit

Why You Should Live Every Week Like It's Social Engineering Week (youtube.com). submitted 1 year ago by KalitorMensa · comment; share; save. hide. report ...



Why You Should Live Every Week Like It's Social Engineering Week

8.5K views · Streamed 1 year ago



Jason Goodman

Sharks swim among us, but how can we know who they are? Visit www.crowdsourcethetruth.com Become a Sponsor of ...

Statement no. 16
(Defendant, Barden to audience)


Statements made by Defendant:

04:19 He (Plaintiff) interfered with an officer of the court, he interfered with your rights to a fair trial (speaking to Barden) and I do hope there are some repercussions for that. Because people should not be interfering in the normal justice process. That was a malicious act.

04:37 (BARDEN speaks) I don't think he did it on his own. I believe he has some kind of guidance. Which makes this organized stalking and harassment. Which is a violation of the U.S. Code 18 Section 241 and 242. Conspiracy against rights.

04:46 Wow, oh really. Excellent Michael.



<https://www.youtube.com/watch?v=obqQTt1jJYM> 



Michael Barden Targeted Individual - Results of Michael's Sentencing Hearing On the Courthouse Steps
4.2K views • Streamed 2 years ago


 Jason Goodman

Statement no. 17
(Defendant with attorney speaks to audience)

Statements made by Defendant:

26:10 We have seen interestingly, this network of individuals who have been alleged in a civil lawsuit to be in a conspiracy to defame me and we are talking of course about David Sweigert and the other people that have been named in that lawsuit.



https://www.youtube.com/watch?v=g_f-kU6Mzg8 

[www.youtube.com](https://www.youtube.com/watch?v=g_f-kU6Mzg8) > watch

[Robert David Steele's Attorney Steven S. Biss Sues ...](https://www.youtube.com/watch?v=g_f-kU6Mzg8) - YouTube

Devin Nunes is the ranking member on the House Intelligence committee but does it seem intelligent to bring an almost certainly ... Robert David Steele's Attorney Steven S. Biss Sues Devin Nunes' Cow - Legal Analysis with Jared Beck.

[odysee.com](https://www.odysee.com/@Crowdsourcethetruth:d/robert-david-...) > @Crowdsourcethetruth:d > robert-david-...

[Robert David Steele's Attorney Steven S. Biss Sues Devin Nunes](https://www.odysee.com/@Crowdsourcethetruth:d/robert-david-...)

...

Robert David Steele's Attorney Steven S. Biss Sues Devin Nunes' Cow - Legal Analysis with Jared Beck. March 20th, 2019 views. Let @Crowdsourcethetruth ...

Statement no. 18
(Defendant, George Webb in so-called "dirty bomb hoax" video)

Statements made by Defendant:

- 22:48** We have this individual. Does anyone recognize this guy? (shows picture below)
Who is DSWEIGERT on Twitter?
- 23:00** Does anyone recognize this guy (pointing)? Who is that? Is this someone that is randomly ranting?
- 23:21** I want to ask George. What is that about?
- 23:43** **George's brother who is making public threats against us.**
- 24:01** If someone is **making public threats**, or someone is accusing me of being a foreign intelligence service, or engaging in espionage, these are potentially, **if not criminal** .. you know .. false accusations .. certainly, libel per se.
- 24:35** I have never interfaced with anyone from the Mossad that I am aware of.
- 30:22** (George Webb appears in telecast screen) George something interesting came up. There is a gentleman on **Twitter named David Sweigert.**
- 30:46** (WEBB speaks) **That's my brother.**
- 31:56** Doesn't look anything like the guy that we have seen to be your brother.



<https://www.youtube.com/watch?v=ekr5cw2WAbU&t=7612s>



www.pinterest.com > ... > Lightning Storm ⋮

Clear and Present Danger (Calm Before the Storm ... - Pinterest

Clear and Present Danger (Calm Before the Storm?) #maerskmemphis · Support this movement, become a sponsor of Crowdsorce the Truth<http://paypal.me/> ...

📺 Videos ⋮



Clear and Present Danger (Calm Before the Storm ...

YouTube · Jason Goodman

Jun 14, 2017



Ta Yuom @TaYuom · Jun 14, 2017

...

Clear and Present Danger (Calm Before the Storm?) #maerskmemphis



Clear and Present Danger (Calm Before the Storm?)...
Support this movement, become a sponsor of
Crowdsorce the ...
youtube.com



Statement no. 19
(Defendant, George Webb in so-called “dirty bomb
hoax” video minus one day)

Statements made by Defendant:

18:39 **Your brother was involved in Iran-Contra** (to GEORGE WEBB)?
10:43 **Why is he threatening me?**
20:00 I don't think it is a funny joke at all to go on the Internet and say fake things. People
 are calling me Brian Goodman and saying I am a MOSSAD agent.
20:21 They are trying to lay the groundwork that I am engaged in espionage.



<https://www.youtube.com/watch?v=0yF5a6Wmecw&t=1213s>

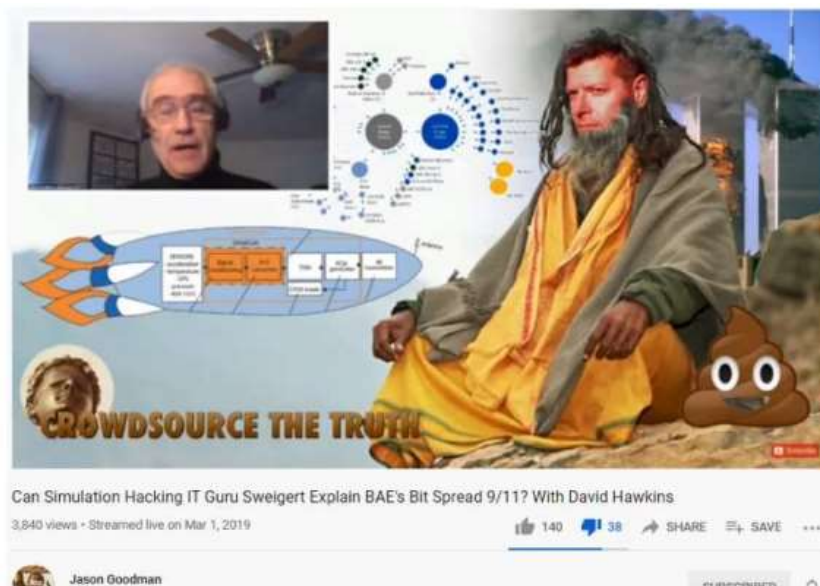


See paragraph 17 of the Second Amended Complaint (ECF no. 88)

Statement no. 20
(Defendant, David Hawkins)

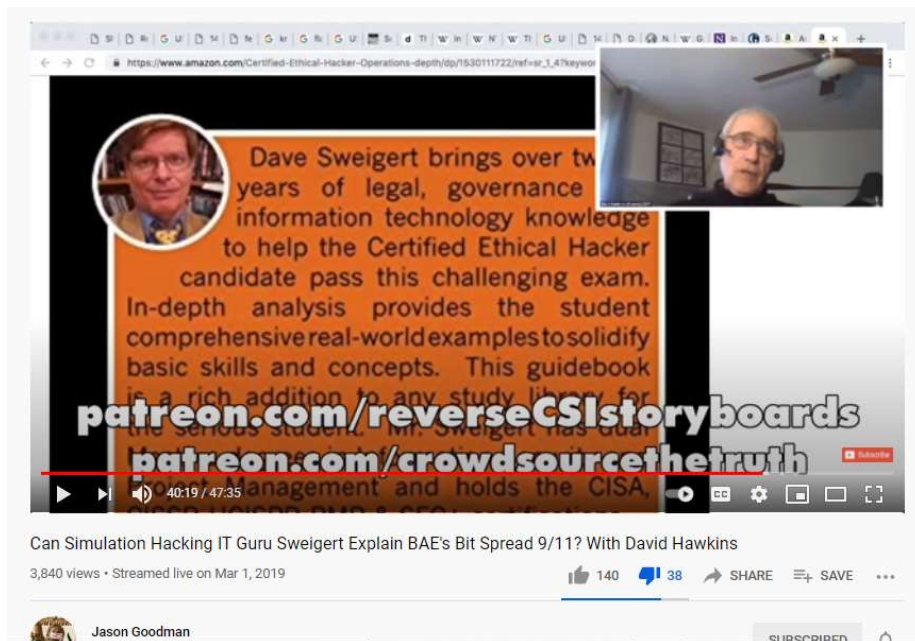
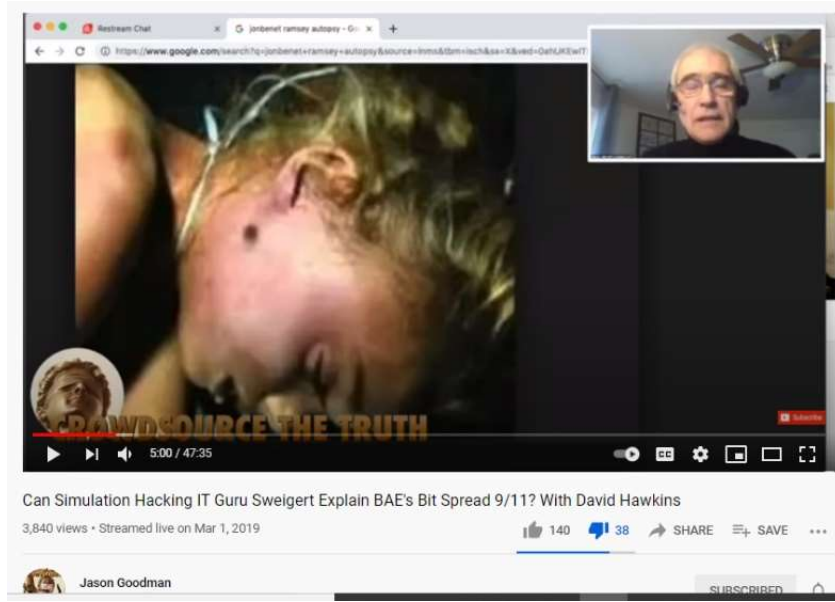
Statements made by Defendant:

- 3:18** (HAWKINS speaks) You know it is quite amazing the relevance of this man David Sweigert has to our endeavors.
- 10:57** (HAWKINS speaks) He (Plaintiff) may be trying to get ahead of **what is inevitably coming in his direction which would be an action for wrongful death.**
- 11:17** Would you call that a **S H I T** storm headed his way, perhaps?
- 14:57** (HAWKINS speaks) For tracking down the guru of **Simulation Hacking and Information Technology (Plaintiff)** and what his role might have been in **switching off the protection systems.**
- 15:44** **I never heard of Mr. Sweigert** as I am sure you didn't (to HAWKINS).
- 16:20** I think it is their true hope to introduce **process crimes** in these civil suites.
- 18:18** Rather than listen to the ramblings of a **very mental disturbed** .. really someone who deserves our pity .. **he has these blue glasses to prevent him from having seizures.** I do honestly believe, I am not trying to disparage the man, I think he needs to **be under close supervision of a mental health professional.**
- 38:53** (HAWKINS) Evidence is nether lost or **gained Mr. Sweigert** at a crime scene investigation. But, some evidence is always wasted. **And you are wasting evidence.**
- 32:29** (HAWKINS) A variety of crimes, including **racketeering.** Which I believe Mr. Sweigert is involved in.



<https://www.youtube.com/watch?v=7J2IhyrT4PQ&t=2443s>





See paragraph 38 of the Second Amended Complaint (ECF no. 88)

Statement no. 21
(Defendant in e-mail message)

Mental illness is a serious matter, you need to seek help. You are hurting yourself by generating a growing collection of evidence that indicates very strongly that you are engaged in an organized criminal harassment campaign against me personally as well as other serious potentially criminal offenses. Every person you have CC'd on this message fully realizes that no actual lawyer would send anonymous messages from the "Evidence Collection" department and the messages themselves represent harassment as I have instructed you to terminate communications with me.

I have submitted my evidence against you to the NY FBI field office and anticipate they will contact you soon. If you'd like to challenge me in civil court, I invite you to file your complaint. It will merely save me the filing fees when I counter sue you for the well documented slander and defamation campaign you have been waging which includes per se libel among other civil torts and potential criminal actions on your part.

You are making matters far worse for yourself every day. My friendly advice is that you cease and desist and discontinue your harassment and / or any mention of me or my company moving forward.

See page 36 of the Second Amended Complaint (ECF No. 88)

*Statement no. 21
(Defendant in e-mail message)*

Dave,

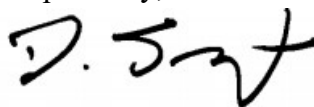
If you refuse to seek the mental health treatment you require, I will at least insist that you retain a legitimate lawyer who will send legitimate letters with a name, phone number and contact information. I would be happy to meet you in court and show my evidence that your year long, ongoing harassment campaign is the root of all your claims. Every recipient of this message knows full well that no legitimate legal entity sends anonymous emails. I have very strong evidence indicating that you, your brother George Webb Sweigert, Robert David Steele and others have conspired for many months to steal money from me, publicly defame me with false accusations of crimes and systematically cyber harassment. This message is further evidence of this effort. You are instructed to discontinue all contact with and communications about me. Please send me your address or the address of your attorney so I may serve you with a formal cease and desist and a temporary restraining order.

Jason

See page 38 of the Second Amended Complaint (ECF No. 88)

Signed this nineteenth (19th) day of March 2021.

Respectfully,

A handwritten signature in black ink, appearing to read "D. Geo. Sweigert". The signature is stylized with a large, sweeping "S" and a distinct "D".

D. Geo. Sweigert

CERTIFICATE OF SERVICE

The undersigned hereby attests under penalties of perjury that copies of this communication have been sent via electronic mail message to the following parties on the nineteenth (19th) of March, two thousand and twenty-one (2021).

Clerk of the Court, Room 200 U.S. District Court 500 Pearl Street New York, New York 10007-1312 temporary_pro_se_filing@nysd.uscourts.gov	Jason Goodman, CEO Multimedia System Design, Inc. 252 7th Avenue, Apart. #6S New York, NY 10001 truth@crowdsourcethetruth.org
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***D. GEORGE SWEIGERT
Pro Se Non-Attorney
GENERAL DELIVERY
NEVADA CITY, CA 95959***